

STATE OF VERMONT
BENNINGTON COUNTY, SS.

2:04-cv-270

LINDA HUNT,)	VERMONT SUPERIOR COURT
Plaintiff)	DOCKET NO. <u>38-9-04</u> Bncv
)	
vs.)	
)	COMPLAINT FOR NEGLIGENCE
MORRISON SALES AND)	
SERVICE, INC., GENERAL)	
MOTORS CORPORATION,)	
Defendants)	

Now Comes the plaintiff, Linda Hunt, by and through counsel, Kerry G. Spradlin, and for her complaint against the defendants in the above-captioned case alleges the following:

Count I. Negligence of Morrison Sales and Service, Inc.

1. Plaintiff is a resident of Buskirk, Rensselaer County, New York
2. Defendant is a corporation, selling and servicing General Motors Corporation vehicles, with its principal place of business situated in the Town of Bennington, Bennington County, Vermont.
3. On July 13, 2001, plaintiff, following a recall notice by General Motors Corporation, took her 1989 Pontiac Grand Prix to Morrison Sales and Service for replacement of the vehicle's front cradle bolts. After the repairs were reportedly completed, plaintiff continued driving her vehicle.
4. On September 7, 2001, at approximately 9:20 PM, plaintiff was driving eastbound at highway speed on Interstate 787 in the Town of Colonie, Albany County, New York, when her steering suddenly failed and the vehicle hit a guardrail on the north side of the roadway.
5. As a result, plaintiff suffered great physical pain and mental anguish, incurred costs for medical treatment and anticipates permanent mental anguish and future medical costs as a result of the defendant's negligent repair/replacement of cradle bolts to her vehicle.

Count II. Negligence of General Motors Corporation

6. Plaintiff repleads paragraphs 1-5 of her Complaint.

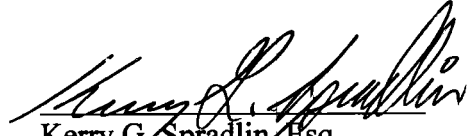
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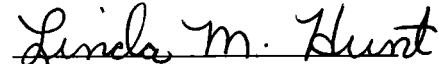
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7. Defendant is a corporation, doing business in the State of Vermont, with its headquarters situated in Detroit, Michigan.
8. Defendant manufactured plaintiff's 1989 Pontiac Grand Prix. The vehicle had defective cradle bolts which failed, resulting in plaintiff being seriously injured September 7, 2001.

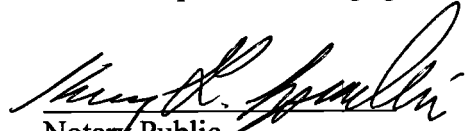
Wherefore plaintiff prays for compensatory damages against the defendants, and each of them as being jointly and severally liable in the amount of two hundred seventy five thousand (\$275,000) dollars.


Kerry G. Spradlin, Esq
Attorney for Linda Hunt
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(802) 747-1464


Linda Hunt

Bennington County
State of Vermont

Now on this 3rd day of September, 2004 there appeared before me, Linda Hunt, known to me, who gave oath to the truth of the facts set forth in her Complaint For Negligence.


Notary Public
My Commission Expires 2/10/07